IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

LITIGATION

ETHICON ELECTION WAVE CASES LISTED IN EXHIBIT A

Master File No. 2:12-MD-02327 MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF ETHICON'S DAUBERT REPLY REGARDING VLADIMIR IAKOVLEV, M.D. FILED IN WAVE 4

Defendants Ethicon, Inc. and Johnson & Johnson ("Ethicon") adopt and incorporate by reference their Wave 4 Reply in Support of Motion to Exclude Testimony of Vladimir Iakovlev, M.D. Dkt. #3865. Ethicon respectfully requests that the Court exclude Dr. Iakovlev's testimony, for the reasons expressed in the Wave 4 briefing. This notice applies to the Election Wave cases identified in Exhibit A attached hereto.

Dated: January 3, 2019

Respectfully submitted,

/s/ Susan M. Robinson

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COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage